

BARRACK, RODES & BACINE POLITICAL ACTION COMMITTEE

7102 MCCALLUM STREET
PHILADELPHIA, PA 19119

March 2, 1994

MAR 7 9 15 AM '94

Ms. Robyn Jimeson
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: FEC Identification No. C00258590

Dear Ms. Jimeson:

I am writing in response to your recent correspondence regarding reports filed by the Barrack, Rodes & Bacine Political Action Committee. For your reference, enclosed is a copy of your correspondence.

Your correspondence raises questions why the reports disclose no payments for administration expenses. The activities of the political action committee are conducted from my home at 7102 McCallum Street, Philadelphia, Pennsylvania. I do not charge the political action committee any rent, nor does the political action committee have any employees. Thus, no salaries are paid. The nominal amount of clerical services performed for the political action committee relate primarily to preparing and filing the reports required by law. These services are volunteered.

I trust that this letter responds to your recent correspondence. If you have any further questions regarding this matter, please feel free to call me. During the day you may reach me at 215-963-0600. In the evenings, you may reach me at 215-247-8118.

Thank you for your cooperation.

Sincerely,

Daniel E. Bacine

DEB:mmm
Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

FEB 25 1994

Daniel E. Bacine, Treasurer
Barrack, Rodos & Bacine
Political Action Committee
7102 McCallum St.
Philadelphia, PA 19119

Identification Number: C00258590

Reference: April Quarterly (1/1/93-3/31/93) and July Quarterly
(4/1/93-6/30/93) Reports

Dear Mr. Bacine:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR §104.11

If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2)

PLEASE NOTE: Should your committee have a non-federal account(s), these administrative expenses MUST be disclosed on Lines 1B, 21(a)(i) and 21(a)(ii) of the Detailed Summary Page and Schedules H2, H3 and H4 (and possibly Schedule H1 if it has not previously been filed). (See 11 CFR §106.6(b)(2)(i)).

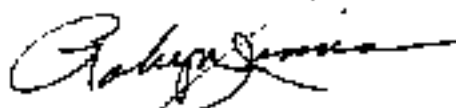
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from

that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Robyn Jameson
Reports Analyst
Reports Analysis Division

24-336317

Federal Election Commission
ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS

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E.S.
PREPARER

3/7/94
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